

# **WISCONSIN LEGISLATIVE COUNCIL STAFF**

## ***RULES CLEARINGHOUSE***

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## **CLEARINGHOUSE RULE 99-066**

### **Comments**

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]**

#### **2. Form, Style and Placement in Administrative Code**

a. The department’s analysis is generally thorough but the analysis fails to indicate that a definition of “physical therapy aide” is provided and what that definition provides.

b. In s. PT 2.01 (8) (a), (b) and (c), the parenthetical abbreviations should be deleted. [See s. 1.01 (6) and (8), Manual.]

c. In the treatment clause of SECTION 7, the comma should be eliminated and replaced by “and.”

#### **4. Adequacy of References to Related Statutes, Rules and Forms**

It appears that the citation to s. 448.40, Stats., under “statutes authorizing promulgation” is incorrect.

#### **5. Clarity, Grammar, Punctuation and Use of Plain Language**

a. In the second paragraph, second sentence, of the department’s analysis, the second “to” should be eliminated. In the third paragraph of the department’s analysis, it appears that material is missing in the second sentence.

b. Does s. PT 5.02 (3) provide sufficient direction for physical therapists?

c. Is the limitation in the last sentence of s. PT 5.02 (10) intended to limit the total number under supervision at any one time; or rather, does it refer to the total number who are eligible to practice under the direct supervision of a physical therapist, whether or not all are practicing at the same time?